

## STATE OF SOUTH CAROLINA

## (Caption of Case)

Troy LaColla, Complainant/Petitioner v. Charter  
Fiberlink SC-CCO, LLC; Frontier Communications  
of the Carolinas, LLC and BellSouth  
Telecommunications, LLC d/b/a AT&T South  
Carolina, Defendants/Respondents

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

## DOCKET

NUMBER: 2017 - 362 - C

(Please type or print)

Submitted by: C. Jo Anne Wessinger HillSC Bar Number: 15025

Address: P.O. Drawer 7788  
(1900 Barnwell Street, 29201)  
Columbia, SC 29202

Telephone: 803-771-4400Fax: 803-779-0016Other: 803-576-3714Email: jhill@richardsonplowden.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input checked="" type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input checked="" type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

REPLY TO: **Columbia**  
E-mail address for C. Jo Anne Wessinger Hill  
[jhill@RichardsonPlowden.com](mailto:jhill@RichardsonPlowden.com)  
Direct Dial: (803) 576-3714

December 29, 2017  
(Dictated December 28, 2017)

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
The Public Service Commission of South Carolina  
101 Executive Center Drive (29210)  
Post Office Drawer 11649  
Columbia, South Carolina 29210

Re: DOCKET NUMBER 2017-362- C  
Troy LaColla, Complainant/Petitioner v. Charter Fiberlink SC-CCO, LLC; Frontier  
Communications of the Carolinas, LLC and BellSouth Telecommunications, LLC  
d/b/a AT&T South Carolina, Defendants/Respondents  
RPR File No. 7377.001

Dear Madame Clerk:

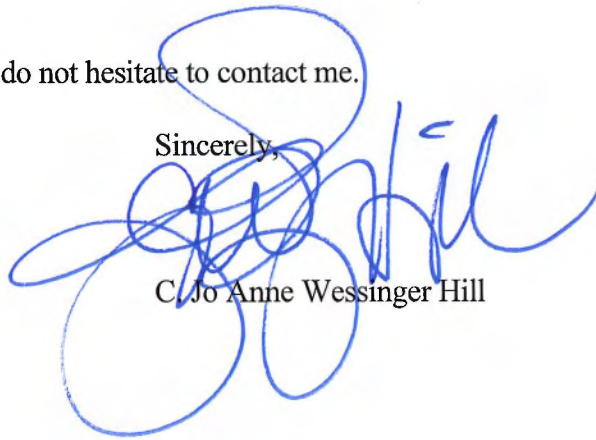
On behalf of Frontier Communications of the Carolinas, LLC (Frontier), Frontier concurs and joins in the Motion to Dismiss for Lack of Subject Matter Jurisdiction and Request for Expedited Ruling submitted by AT&T South Carolina and in the Motion to Dismiss and Request for Suspension of Deadlines by Charter FiberLink. Frontier would make similar arguments as presented by the other respondent service providers regarding the Commission's lack of jurisdiction concerning broadband service [SC Code §58-0-280(G)(a)] and/or Internet service which Mr. LaColla's complaint appears to relate, and that the scheduling notice and deadlines should be suspended or revised. Frontier further agrees that a status conference with all parties may be helpful. If Mr. LaColla's Complaint relates to the provision of basic local exchange telephone service, then Frontier reserves the right to further address, amend, and answer any such complaint. Attached for filing please find this letter with the enclosed Docket Cover Sheet, Notice of Appearance and Certificate of Service pertaining to the above referenced matter.

By copy of this letter, I am serving all parties of record with a copy of the same as indicated on the attached Certificate of Service with this letter.

Ms. Boyd  
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If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Jo Anne Wessinger Hill', is written over the word 'Sincerely,'. The signature is stylized with large loops and a long horizontal stroke at the end.

C. Jo Anne Wessinger Hill

CJWH/tbj

cc: Parties/Counsel of Record

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**  
**DOCKET 2017-362-C**

IN RE:

Troy LaColla,

Complainant/Petitioner

v.

Charter Fiberlink SC-CCO, LLC; Frontier  
 Communications of the Carolinas, LLC  
 and BellSouth Telecommunications, LLC  
 d/b/a AT&T South Carolina,

Defendants/Respondents

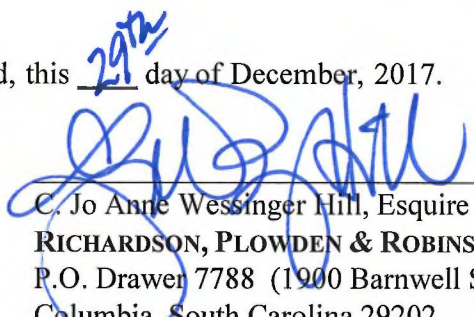
**NOTICE OF APPEARANCE**

Please accept for filing this notice of appearance of C. Jo Anne Wessinger Hill of Richardson Plowden & Robinson, P.A., as counsel of record for Frontier Communications of the Carolinas, LLC in this proceeding. It is requested that the Commission note our appearance for the record and add my name as counsel of record for Frontier Communications of the Carolinas, LLC (Frontier), as well as continue to provide service to Susan A. Miller, who is a Manager Government and Regulatory Affairs for Frontier in South Carolina. A copy of this Notice is being served on all parties of record.

It is further requested that any further information or correspondence filed with the Commission be served on the undersigned as counsel for Frontier Communications of the Carolinas, LLC.

Respectfully submitted, this 29<sup>th</sup> day of December, 2017.

By:

  
 C. Jo Anne Wessinger Hill, Esquire  
 RICHARDSON, PLOWDEN & ROBINSON, P.A.  
 P.O. Drawer 7788 (1900 Barnwell Street, 29201)  
 Columbia, South Carolina 29202  
 803-771-4400  
 803-771-0016 facsimile  
 Email: jhill@richardsonplowden.com  
 ATTORNEYS FOR FRONTIER COMMUNICATIONS OF THE  
 CAROLINAS, LLC

December 29, 2017  
 Columbia, South Carolina.